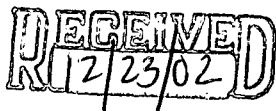


The Goodyear Tire & Rubber Company

Akron, Ohio 44316-0001



1144 East Market Street
Akron, Ohio 44316-0001

December 10, 2002

Mr. Seth Ausubel
Remedial Project Manager
United States Environmental Protection Agency
Region II Emergency and Remedial Response Division
290 Broadway, 19th Floor
New York, NY 10007-1866

RE: The Goodyear Tire & Rubber Company response to the EPA
Request for information Pursuant to Section 104(e) of CERCLA
for the Berry's Creek Study Area (the "site") Bergen County,
Carlstadt, New Jersey

Dear Mr. Ausubel:

The Goodyear Tire & Rubber Company ("Respondent") respectfully submits the following responses to U.S. EPA's Request for information received by Respondent on October 16, 2002. This Response is being filed within the extension of time of no later than December 20, 2002 that you granted Respondent on October 28, 2002 to file its Response.

In its October 16, 2002 letter, U.S. EPA specifically stated that it is seeking information concerning the "release and threat of release of hazardous substances into the environment at the Berry's Creek Study Area Bergen County, New Jersey (the "Study Area")". More specifically, the U.S. EPA requests information pertaining to the "Site" located at 240 Paterson Plank Road, Carlstadt, Bergen County, New Jersey.

Respondent commenced its investigation based on the information that U.S. EPA has provided in its October 16, 2002 letter. Additionally, on November 11, 2002 Respondent submitted a request under the Freedom of Information Act for a copy of all information, documents and records in U.S. EPA's possession which were used to identify Respondent as possibly being linked to the Site. A reply to this request has yet to be received and Respondent will reply to these documents in a separate Response.

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Respondent has made a diligent search for information and records available to Respondent that are related to this request. Respondent's responses are based on all information available to Respondent as of this date. Respondent does not waive and does hereby preserve the right at any time should future information or documents be subsequently brought to its attention; to revise, correct, add to, or clarify any of the responses made in this Response. Respondent further reserves the right to raise any additional objections deemed necessary and appropriate as a result of any further review.

General Objections

1. Respondent objects to U.S. EPA's definition of the term "documents" on the ground that it is overly broad, unduly burdensome, goes beyond the scope of the purpose of U.S. EPA's inquiry concerning the Site and seeks to cover documents not necessarily in Respondent's custody or control.
2. Respondent objects to U.S. EPA's definition of the terms "you" or "Respondent" to the extent that the definition includes persons and business or legal entities over which Respondent has no control nor can it know what information such persons and entities might know.

Request for Information

- 1(a). State the correct legal name and mailing address of your Company.**

Response to Question 1(a).

The Goodyear Tire & Rubber Company
1144 East Market Street
Akron, Ohio 44316-0001

- (b). Identify the legal status of your Company (corporation, partnership, sole proprietorship, specify if other) and the state in which your Company was organized or formed.**

Response to Question 1(b).

The Goodyear Tire & Rubber Company is a corporation formed in the State of Ohio on August 29, 1898.

- (c). **State the name(s) and address(es) of the President, Chairman of the Board, and the Chief Executive Officer of your Company.**

Response to Question 1(c).

Samir G. Gibara, Chairman of the Board and Chief Executive Officer; 1144 East Market Street; Akron, Ohio 44316-0001

Robert J. Keegan, President and Chief Operating Officer; 1144 East Market Street; Akron, Ohio 44316-0001

- (d). **If your Company is a subsidiary or affiliate of another corporation, or has subsidiaries, identify each such entity and its relationship to your Company, and state the name(s) and address(es) of each such entity's President, Chairman of the Board, and Chief Executive Officer.**

Response to Question 1(d).

The Goodyear Tire & Rubber Company is not a subsidiary or affiliate of another company. In regards to its own subsidiaries, see attached "Exhibit A".

- (e). **Identify the state and date of incorporation and the agent of service of process in the state of incorporation and in the State of New Jersey for your Company and for each entity identified in your Response to question 1.d., above.**

Response to Question 1(e).

Ohio, August 29, 1898

Agent of service of process in Ohio is the C T Corporation System, 1300 East 9th Street; Cleveland, Ohio 44114

Agent of service of process in New Jersey is The Corporation Trust Company, 820 Bear Tavern Road; West Trenton, NJ 08628

- (f). **If your Company is a successor to, or has been succeeded by another entity, identify such other entity and provide the same information requested in question 1.e., above.**

Response to Question 1(f).

N/A

2. **Provide a description of the Site, i.e. the property or properties in Carlstadt, Bergen County, New Jersey, which your Company owned or owns, or upon which it operated or leased, or currently operates or leases. Include Block and Lot numbers, names of streets or physical features bounding the property(ies), and acreage.**

Response to Question 2.

In regards to the "Site" identified by the U.S. EPA in its request for information, The Goodyear Tire & Rubber Company does not now or ever in the past owned, leased or operated anything located at 240 Paterson Plank Road, Carlstadt, Bergen County, New Jersey.

It is the understanding of The Goodyear Tire & Rubber Company that the "Site" was owned by Mr. Jerry Tramontozzi and operated through his business T & S Tire service dba Bergen Tire.

The Goodyear Tire & Rubber Company has a "electric sign agreement" with this location. The sign agreement allows this location to advertise itself as a Goodyear authorized seller but is not owned by Goodyear nor is it operated by any individual connected to Goodyear.

3. **Provide a description of the Site, i.e. the property or properties in Carlstadt, Bergen County, New Jersey, which your Company owned or owns, or upon which it operated or leased, or currently operates or leases. Include Block and Lot numbers, names of streets or physical features bounding the property(ies), and acreage.**

Response to Question 3.

N/A; see Response to Question 2.

4. **Please specify the time period during which the Company leased, owned, and/or operated the Site. If the Company leased, owned or operated at portions of the Site, specify the time periods of such involvement, and appropriate block and lot numbers. If your Company ever leased the Site, provide copies of leases, names, current addresses and telephone numbers of each owner of the Site during the period the Company leased the Site.**

Response to Question 4.

N/A; see Response to Question 2.

5. **Describe the Site at the time the Company took possession of it. If there was any business at the Site, explain the nature of that business.**

Response to Question 5.

N/A; see Response to Question 2.

6. **Describe in detail the nature of the activities conducted by the Company at the Site from the time the Company began operations at the Site until the present time, including:**

- a. **the services performed at the Site;**
- b. **all products which the Company manufactured, supplied, or sold which resulted from activities at the Site;**
- c. **research and development activities; and**
- d. **the time period during which those activities occurred.**

Response to Question 5. (a) – (d).

N/A; see Response to Question 2.

7. **Did your Company cease operations at the Site? If so, when? Describe the circumstances that precipitated your Company's decision to cease operations at the Site.**

Response to Question 7.

N/A; see Response to Question 2.

8. **Did your Company generate hazardous wastes at the Site, or does your company currently do so? Please describe your company's treatment, storage and/or disposal practices for any hazardous wastes generated at the Site.**

Response to Question 8.

N/A; see Response to Question 2.

9. **Provide a list of all local, state and federal environmental permits ever granted for the Site or any part thereof (e.g., RCRA permits, NPDES permits, etc.)**

Response to Question 9.

N/A; see Response to Question 2.

10. **List all hazardous substances (as defined in the "Instructions"), which were, or are, used, stored, or handled at the Site.**

Response to Question 10.

N/A; see Response to Question 2.

11. **State when and where each substance identified in your Response to Question 10 was, or is, used, stored, or handled at the Site and the volume of each substance.**

Response to Question 11.

N/A; see Response to Question 10.

12. **Describe in detail how and where the hazardous wastes, industrial wastes, and hazardous substances generated, handled, treated, and stored at the Site were, or are, disposed of. If any hazardous wastes, hazardous substances, or industrial wastes were, or are, taken off-site for disposal or treatment, state the names and addresses of the transporters and the disposal facility used.**

Response to Question 12.

N/A; see Response to Question 2.

13. **Who determined, or determines, where to treat, store, and/or dispose of the hazardous substances and/or hazardous wastes handled at the Site? Provide the names and current or last known addresses of any entities or individuals which made such determination.**

Response to Question 13.

N/A; see Response to Question 2

14. **Describe in detail the remedial activities conducted at the Site under CERCLA, the Resource Conservation and Recovery Act (RCRA), and/or laws of the State of New Jersey. Describe your company's involvement in the remedial activities.**

Response to Question 14.

Remedial activities undertaken are unknown; The Goodyear Tire & Rubber Company is not involved in any remedial activities at this Site; see Response to Question 2.

15. **Identify all leaks, spills, or releases into the environment of any hazardous substances, pollutants, or contaminants that have occurred, or are occurring, at or from the Site. Specifically identify and address any leaks, spills, or releases to the Berry's Creek Study Area. Identify:**

a. **when such releases occurred;**

- b. how the releases occurred;
- c. the amount of each hazardous substances, pollutants or contaminants so released (for substances contained in any sewage effluent from the Site, provide discharge monitoring reports or other data indicating discharge concentrations and loads, as available);
- d. where such releases occurred;
- e. where such releases entered the Berry's Creek Study Area, if applicable; and
- f. the pathway by which such releases entered the Berry's Creek Study Area, including any storm sewers, pipes, or other conveyances discharging to a water body or wetland; or via surface runoff, groundwater discharge, or any spills, leaks, or disposal activities.

Response to Question 15.(a) – (f)

The Goodyear Tire & Rubber Company has no knowledge of any leaks, spills or releases of any hazardous materials into the Study Area or the Site; furthermore The Goodyear Tire & Rubber Company does not own property or lease property at the Site and would not have any knowledge of the activities of the owners of the property located at the Site. See Response to Question 2.

16. Please complete the form on page 5, below. Indicate on the form whether each of the chemicals listed has ever been released from the Site to the Berry's Creek Study Area, including creeks, ditches, or other waste bodies, or wetlands. Follow all additional instructions on the form. In addition, please answer Question 15, above, specifically addressing any chemicals for which you answered "yes".

Response to Question 16.

N/A; see Response to Question 2.

17. **Identify all companies, firms, facilities, and individuals (hereafter referred to as "customers") from whom your Company obtained, or obtains, materials containing Industrial Waste as defined in Number 6 of the Definitions and whose Industrial Waste was, or is, treated, stored, handled or disposed of at the Site. For each customer:**
- a. **Describe the relationship (the nature of the services rendered and products purchased or sold) between your Company and the customer;**
 - b. **Provide Copies of any agreements or/and contracts between your Company and the customer;**
 - c. **Provide the name and address of each customer who sent materials, including contact person (s) within said customer;**
 - d. **Provide shipping and transaction records pertaining to such Industrial Wastes sent by each customer, including but not limited to invoices, delivery receipts, receipts acknowledging payment, ledgers reflecting receipt of payment, bills of lading, weight tickets, and purchase orders; and**
 - e. **Provide the name and address of all companies and individuals who transported, or transport, Industrial Wastes to the Site.**

Response to Question 17 (a) - (f)

N/A; see Response to Question 2.

18. **For each customers' Industrial Wastes handled, treated, stored, or disposed of at the Site, describe:**

- i. **the volume;**
- ii. **the nature;**
- iii. **chemical composition;**
- iv. **color;**
- v. **smell;**

- vi. physical state (e.g., solid, liquid);
- vii. any other distinctive characteristics; and
- viii. the years during which each customer's materials were handled, treated, stored, or disposed of at the Site.

Response to Question 18.

N/A; See Response to Question 2.

19. Please supply any additional information or documents that may be relevant or useful to identify other companies or sources that sent industrial wastes to the Site.

Response to Question 19.

N/A; see Response to Question 2

20. Please state the name, title, and address of each individual who assisted or was consulted in the preparation of your Response to this request for Information and correlate each individual to the question on which he or she was consulted.

Response to Question 20.

Takashi Ito, Attorney
Law D/822
1144 East Market Street
Akron, Ohio 44316-0001
(330) 796-3084
(330) 796-8836 (facsimile)

Dale B. Walker, Senior Paralegal
Law D/822
1144 East Market Street
Akron, Ohio 44316-0001
(330) 796-9405
(330) 796-8836 (facsimile)

Karen D. Burlingame, Environmental Engineer
Global Environmental Engineering D/110F
1144 East Market Street
Akron, Ohio 44316-0001
(330) 796-1735
(330) 796-6459 (facsimile)


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- 21. For each question herein, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the question and provide true and accurate copies of all such documents.**

Response to Question 21.

There are no documents that are responsive to this request; see Response to Question 2.

Sincerely,


Karen D. Burlingame,
Environmental Engineer

/dbw

EXHIBIT A

Domestic Subsidiary Corporations	State	Date
THE GOODYEAR TIRE & RUBBER COMPANY	OHIO	12/05/200
Air Treads, Inc.	Georgia	06/05/200
Allied Tire Sales, Inc.	Florida	04/23/200
AOT Inc.	Delaware	
Belt Concepts of America, Inc.	Delaware	03/13/200
Brad Ragan, Inc (Dissolved December 23, 1999)	North Carolina	
Celeron Corporation	Delaware	04/19/200
Cosmoflex, Inc.	Delaware	04/08/200
Divested Atomic Corporation	Delaware	12/03/200
Divested Companies Holding Company	Delaware	12/03/200
Divested Litchfield Park Properties, Inc.	Arizona	12/03/200
Garvey Sales & Service, Inc.	Dissolved	08/29/200
Goodyear-SRI Global Purchasing Company	Ohio	12/01/200
Goodyear-SRI Global Technology LLC	Ohio	05/08/200
Goodyear Dunlop Tires North America, Ltd.	Ohio	05/15/200
Goodyear Farms, Inc.	Arizona	01/08/200
Goodyear International Corporation	Delaware	03/25/200
Goodyear Tire & Rubber Company Fund	Delaware	09/24/200
Goodyear Western Hemisphere Corporation	Delaware	02/05/200
Laurelwood Properties Inc.	Delaware	04/02/200
Murphy's Inc. of Benicia	California	04/01/200
Murphy's Inc. of San Jose	Dissolved	09/27/200
Murphy's Inc., Sales and Service	Dissolved	09/27/200
Retreading L, Inc.	Delaware	11/16/200
Retreading L, Inc. of Oregon	Oregon	11/16/200
The Goodyear Rubber Plantations Company	Ohio	03/19/200
The Kelly-Springfield Tire Corporation	Delaware	05/14/200
Tire Management, Inc.	California	03/15/200
UCTC, LLC #2	Delaware	11/25/200
Western States Tires and Auto Service, Inc.	Dissolved	05/30/200
Wheel Assemblies	Delaware	05/14/200
Wingfoot A/R LLC	Delaware	08/06/200
Wingfoot Commercial Tire Systems, LLC	Ohio	10/01/200
Wingfoot Corporation	Delaware	01/17/200
Wingfoot Ventures Eight Inc.	Delaware	06/06/200
Wingfoot Ventures Fifteen Inc. (Dissolved September 10,	Delaware	11/16/200
Wingfoot Ventures Four Inc	Delaware	04/16/200
Wingfoot Ventures Thirteen Inc.	Delaware	11/16/200